

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF SETH
A. GOLDBERG, ESQ.**

SETH A. GOLDBERG, ESQ., being of full age, certifies as follows:

1. I am a Partner at Duane Morris LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Princeton Pharmaceutical Inc., and Solco Healthcare US, LLC. I am Liaison Counsel for all Defendants in this MDL. I make this Certification based on personal knowledge and in support of the Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Preclude Opinions of Defense Expert Lee-Jen Wei, Ph.D.

2. Attached hereto as Exhibit A is a true and accurate copy of the Expert Report of Lee-Jen Wei, Ph.D., dated August 2, 2021, with Exhibits A & B served in MDL 2875.

3. Attached hereto as Exhibit B is a true and accurate copy of the Expert Report of David Madigan, Ph.D., dated July 7, 2021, with Appendices 1 & 2 served in MDL 2875.

4. Attached hereto as Exhibit C is a true and accurate copy of the transcript of the deposition of Lee-Jen Wei, Ph.D., in MDL 2875, dated September 14-15, 2021, with errata.

5. Attached hereto as Exhibit D is a true and correct copy of the cited excerpts of the deposition of Herman J. Gibb, Ph.D., M.P.H., in MDL 2875, dated September 29, 2021.

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg, *Liaison Counsel*
for Defendants

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Dated: December 1, 2021